

ATTACHMENT A
Statement of Facts: Carlos DeAngelo Bell

The United States and the Defendant stipulate and agree that if this case proceeded to trial, the United States would prove the facts set forth below beyond a reasonable doubt. They further stipulate and agree that these are not all of the facts that the United States would prove if this case proceeded to trial.

In November 2016, the Charles County Sheriff's Office began an investigation after receiving a report from a concerned citizen that Carlos DeAngelo **BELL**, an Instructional Assistant at Benjamin Stoddert Middle School ("Stoddert"), and a track and field coach at La Plata High School, was concealing his identity and having improper sexually explicit electronic communications with minors on the track team. Both schools are located in Charles County, Maryland. As a result of the information learned during the course of the investigation, Charles County Sheriff's Office Deputies executed a search and seizure warrant at Carlos DeAngelo **BELL**'s residence, located at 3353 Jonathan Court, Waldorf, Charles County, Maryland on December 22, 2016. Charles County Sheriff's Deputies seized computers, tablets, cellular telephones, and other physical evidence from the residence. Deputies subsequently interviewed **BELL**, where he acknowledged that he is HIV-positive.

Maryland State Police began a digital forensic examination of the digital media recovered from **BELL**'s residence. At least 42 minors between the ages of 11 and 17 were discovered to have been recorded by **BELL** in locations including **BELL**'s residence, his vehicle, and Stoddert. As a result of the digital forensic analysis and over 100 interviews, investigators learned that **BELL** engaged in the following conduct:

1. Assumed the online identities of a minor male or a minor female to solicit from minors images and videos of the same minors engaging in sexual conduct;
2. Convinced minors that they could be involved in a Chicago-based gang, and ritualistically struck nude minor victims as a form of violent initiation into the gang;
3. Routinely provided marijuana and alcohol to male Stoddert students, including prior to producing images of their sexual exploitation; and
4. Surreptitiously recorded different minor males masturbating in **BELL**'s bedroom, as well as surreptitiously recorded minor males engaging in the act of apparent vaginal intercourse with a silicone sex toy in the shape of the pelvis of a female, provided by **BELL**.

BELL produced the following images and videos of the sexual exploitation of ten minor males:

Count 1 - [victim's name and title of video withheld to protect victim 1's identity] is a video recovered from **BELL**'s iMac computer that shows victim 1 in **BELL**'s bedroom engaged in apparent vaginal intercourse with a silicone sex toy provided by **BELL**, with **BELL** present in the room and simultaneously slapping the toy;

Count 2 - [victim's name withheld to protect victim 2's identity] is a video entitled IMG_0003.mov, recovered from **BELL**'s iMac computer, which shows **BELL** at Stoddert receiving fellatio from victim 2 and ejaculating in victim 2's mouth;

Count 3 - [victim's name withheld to protect victim 3's identity] is a video entitled IMG_7930.mov, recovered from **BELL**'s iPhone 6 Plus, which shows **BELL** at Stoddert using his hand to stimulate victim 3's exposed penis;

Count 4 - [victim's name withheld to protect victim 4's identity] is a video entitled IMG_1474.mov, recovered from **BELL**'s iMac computer, which shows **BELL** at Stoddert using his penis to repeatedly anally penetrate victim 4;

Count 5 - [victim's name withheld to protect victim 5's identity] is a video entitled Video SEP 27.5 52 40 PM.mov, recovered from **BELL**'s iMac computer, which shows victim 5 in **BELL**'s bedroom engaged in apparent vaginal intercourse with the silicone sex toy provided by **BELL**, while **BELL** surreptitiously streams a live video feed from the camera of his iMac, located in his bedroom, to a television where **BELL** watches from the common room just outside **BELL**'s bedroom;

Count 6 - [victim's name withheld to protect victim 6's identity] is a video entitled IMG_1748.mov, recovered from **BELL**'s iMac computer, which shows **BELL** recording himself, victim 6, and another minor male nude and masturbating in **BELL**'s bedroom;

Count 7 - [victim's name withheld to protect victim 7's identity] is a video entitled IMG_2714.mov, recovered from **BELL**'s iMac computer, which shows **BELL** recording himself and victim 7 in **BELL**'s bedroom nude and masturbating, and victim 7 engaged in apparent vaginal intercourse with the previously referenced silicone sex toy provided by **BELL**;

Count 8 - [victim's name withheld to protect victim 8's identity] is a video entitled IMG_1747.mov, recovered from **BELL**'s iMac computer, which shows **BELL** recording himself, victim 8, and another minor male nude and masturbating in **BELL**'s bedroom;

Count 9 - [victim's name and title of video withheld to protect victim 9's identity] is a video recovered from **BELL**'s iMac computer, which shows **BELL** setting up the camera in his bedroom, then using a sex toy in the likeness of an adult female head with mouth to perform apparent fellatio on victim 9, then **BELL** masturbates in the bed next to victim 9, then **BELL** performs fellatio on victim 9;

Count 10 - [victim's name withheld to protect victim 10's identity] is a video entitled IMG3220.mov, recovered from **BELL**'s iMac computer, which shows victim 10 in **BELL**'s bedroom engaged in apparent vaginal intercourse with the previously

referenced silicone sex toy provided by **BELL**, while directed by **BELL**, who himself is masturbating.

BELL is not wearing a condom in any of the described videos, which were all produced since **BELL** began employment at Stoddert in 2014.

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I have read this Attachment A and carefully reviewed every part of it with my attorney. I understand it, and I voluntarily agree to it. I do not wish to change any part of it. I am completely satisfied with the representation of my attorney.

1/22/18
Date

Carlos DeAngelo Bell
Carlos DeAngelo Bell

I am Carlos DeAngelo Bell's attorney. I have carefully reviewed every part of this Attachment A. He advises me that he understands and accepts its terms. To my knowledge, his decision to enter into this agreement is an informed and voluntary one.

1/22/18
Date

James Crawford, Esq.
James Crawford, Esq.